

MARK R.S. FOSTER (SBN 223682)
mark.foster@skadden.com
BONIFACIO C. SISON (SBN 335484)
bonifacio.sison@skadden.com
MADISON M. FLOWERS (SBN 345759)
madison.flowers@skadden.com
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
525 University Avenue
Palo Alto, California 94301
Telephone: (650) 470-4500
Facsimile: (650) 470-4570

Attorneys for Defendants
Defendants Visa Inc., Ryan McInerney,
Chris Suh, Vasant Prabhu, Alfred F. Kelly, Jr.,
Peter Andreski, Oliver Jenkyn, and Jack Forestell

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

BEIBEI CAI, Individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

VISA INC, RYAN MCINERNEY, CHRIS
SUH, VASANT PRABHU, ALFRED F.
KELLY, JR., PETER ANDRESKI, OLIVER
JENKYN, and JACK FORESTELL,

Defendants.

Case No. 5:24-cv-08220-NW

**[PROPOSED] ORDER GRANTING
DEFENDANTS' MOTION TO STRIKE
PORTIONS OF AMENDED CLASS
ACTION COMPLAINT FOR
VIOLATIONS OF THE FEDERAL
SECURITIES LAWS**

Date: December 17, 2025
Time: 9:00 a.m.
Court: Courtroom 3, 5th Floor
Judge: Hon. Noël Wise

[PROPOSED] ORDER

The Motion to Strike filed by Defendants Visa Inc, Ryan McInerney, Chris Suh, Vasant Prabhu, Alfred F. Kelly, Jr., Peter Andreski, Oliver Jenkyn, and Jack Forestell was heard on December 17, 2025 at 9:00 a.m. by this Court. For all of the reasons articulated in Defendants' briefing and during oral argument, the Court finds that the motion should be granted.

After full consideration of the pleadings and the authorities submitted by counsel, and good cause appearing, the Court hereby GRANTS Defendants' Motion to Strike in its entirety.

IT IS SO ORDERED.

Dated: _____

Honorable Noël Wise
United States District Judge